

**Exhibit 1**  
**July 1, 2024, Letter**



**U.S. Department of Justice**

Environment and Natural Resources Division

90-5-1-1-09841 and 90-5-1-1-09841/1

*Environmental Enforcement Section*  
*P.O. Box 7611*  
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July 1, 2024

Via Email and CM/ECF

Ted Henifin  
Interim Third-Party Manager  
ted@jxnwater.com

Re: July 1 Update Pursuant to SNAP Order in *United States and State of Mississippi v. City of Jackson, MS*, Case No. 3:12-cv-790-HTW-LGI (Clean Water Act Case) and *United States v. City of Jackson, MS*, Case No. 3:22-cv-00686-HTW-LGI (Safe Drinking Water Act Case)

Dear Mr. Henifin:

The Court's April 16, 2024, Order ("SNAP Order") required that "the relevant federal and/or State agencies implementing the SNAP program shall provide the ITPM a list in CSV (comma-separated values) format, containing the name and address of recipients of SNAP benefits residing in the [listed] zip codes" and that they "shall further provide any updated list to the ITPM on the first business day of each calendar quarter thereafter beginning on July 1, 2024." SNAP Order [Dkt. No. 107] at 4.

Accordingly, the United States, on behalf of USDA, submits this letter to provide the required July 1 update, in compliance with the SNAP Order. Based upon USDA's review of updated information in its possession since its search to meet the SNAP Order's initial deadline,<sup>1</sup> USDA does not have information responsive to the SNAP Order. USDA only has SNAP household data for 6 households from January and February 2024 that falls within the covered zip codes, which it obtained from the Mississippi Department of Human Services as part of its quality review process (a sampling process USDA conducts to determine each State's rate of

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<sup>1</sup> USDA previously conducted a diligent search for responsive information to meet the SNAP Order's initial deadline of April 30, 2024, which was later extended to May 14, 2024, under a Court-approved Stipulation for an Extension of Time [Dkt. No. 109]. This search yielded no responsive information. [See Dkt. No. 111 (letter from United States to Court).] Please note that, at the time, USDA determined it had information for 17 households from the last three months of calendar year 2023 that fell within the covered zip codes. *Id.* at 1-2. Upon further review, however, USDA has determined that it had information for only 8 such households.

SNAP payment errors). This five- to six-month-old data is not current. Thus, the limited data in USDA's possession does not indicate the recipient-households that are currently "residing" within the covered zip codes, and it is therefore not responsive to the Court's order.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angela Mo", with a stylized flourish at the end.

Angela Mo

Cc: Paul Calamita, Esq., Counsel for the ITPM  
Malissa Wilson, Esq., Counsel for the ITPM  
Mitch McGuffey, Counsel for the ITPM  
Mina Kim, Esq., USDA  
Virginia Henning, Esq., USDA  
Sarah Merrill, Esq., USDA  
CM/ECF Service List